# REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

## 35 U.S.C. §103(a) Rejection – Seeker, Krancher

Claims 1, 2, 7, 9-11, 23, 24, and 26-28 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,141,757 issued to Seeker et al. (hereinafter "Seeker") in view of U.S. Patent No. 6,799,237 issued to Krancher et al. (hereinafter "Krancher"). Without admitting that these references could or should be combined, the Applicants respectfully submit that the present claims are allowable over Seeker and Krancher.

Claim 7 recites:

*"A method, comprising:*

*monitoring for communication of trusted data cycles on a bus with a secured docking logic of a computer system, the secured docking logic coupled between the bus and a docking connector;*

*detecting each of the trusted data cycles by **detecting a** <u>same predefined trusted data cycle</u> <u>indicator</u> at the **<u>beginning</u>** of **each** of the **trusted data cycles** with the secured docking logic; and*

*preventing the trusted data cycles that **each <u>begin</u>** with the <u>same predefined trusted data</u> <u>cycle indicator</u> from being available to a component external to the computer system with the secured docking logic".*

As understood by Applicants, Seeker and Krancher do not disclose these limitations or render them obvious. In particular, as understood by Applicants, Seeker and Krancher do not disclose or render obvious *"detecting each of the trusted data cycles by **detecting** <u>a same</u>* <u>*predefined trusted data cycle indicator*</u> *at the **<u>beginning</u>** of **each** of the **trusted data cycles** with the secured docking logic; and preventing the trusted data cycles that **each <u>begin</u>** with the **<u>same</u>** <u>*predefined trusted data cycle indicator*</u> from being available to a component external to the computer system with the secured docking logic".*

Seeker discusses in part a secure computer with a bus monitoring system and methods. See e.g., the Title. FIG. 1 of Seeker shows a secure computer system 100 that includes a bus access monitor 200.

In rejecting *"detecting the predefined trusted data cycle indicator"* in claim 10, the Examiner appears to have relied upon column 3, lines 55-60 of Seeker. See e.g., the bottom of page 4 of the present Office Action. However, at column 3, lines 57-60 of Seeker, it is clearly stated *"BAM 200 asserts alarm signal 203 and interrupt signal 209 when address information associated with a datum fails to compare to predetermined address information (emphasis added)"*.

This is entirely different from the limitations in claim 10 of *"detecting each of the trusted data cycles by detecting a same predefined trusted data cycle indicator at the beginning of each of the trusted data cycles with the secured docking logic"*. Firstly, Seeker does not disclose trusted data cycles that *"each"* have *"a same predefined trusted data cycle indicator"*. There is no disclosure in Seeker that the address information associated with the datum would be the **same**. Secondly, the *"address information"* of Seeker is not *"a predefined trusted data cycle indicator"*. Thirdly, there is no disclosure that the address information of Seeker is at the *"beginning"* of the datum.

Krancher does not appear to remedy all of what is missing from Seeker. Also, the Examiner does not appear to have relied upon Krancher as disclosing all of these missing limitations or articulated where all of these missing limitations could be found in Krancher.

Furthermore, Applicants respectfully submit that Seeker and Krancher should not be combined in the manner proposed by the Examiner. Applicants respectfully submit that the Examiner has failed to articulate sufficient reasoning to justify combining Seeker and Krancher in the manner proposed. With regard to claim 10, the Examiner has asserted *"it would have been obvious to a person of ordinary skill in the art at the time the invention was made to combine*

*Krancher with Seeker, since one would have been motivated **to increase functionality of the coupled unites/devices (emphasis added)**".*   Increasing functionality of the coupled unites/devices is insufficient articulated reasoning to combine and modify these references as proposed.

Seeker discusses a "*secure*" computer. See e.g., the Title.  In contrast, Krancher pertains to "*compatibility*".

Krancher discusses identifying and synchronizing **incompatibilities** between a portable computer and a docking station. See e.g., the Title.  As discussed at column 2, lines 15-19, damage and limited functionality may result in the event of incompatibilities or when software updates are needed.  As discussed at column 2, lines 20-26, "*What is needed in the art is an inexpensive and reliable mechanism to insure that each notebook and docking station are **compatible before allowing a complete electrical docking** (emphasis added). What is further needed in the art is a mechanism or method that determines whether **functionality** (emphasis added) may be lost between a docking station and a notebook, and notifying the computer user of that inadequacy*".

FIG. 1 shows quick switches 86 that are used to couple the portable computer and the docking station when they are sufficiently compatible, or de-couple the portable computer and the docking station when they are not sufficiently **compatible**.  See e.g., column 5, lines 47-57.  The type of compatibility is discussed further in conjunction with FIG. 3 of Krancher.  As discussed at column 6, lines 40-44, "*software executed in the notebook computer 200 makes an initial determination as to whether the notebook is **compatible** with the docking station based on the information that represent a **products code** of the docking station (block 22)*".  As discussed at column 6, lines 48-52, "*If the two devices are **incompatible**, the decision process ends and the quick switches 80 for the PCI bus are not closed (blocks 24 and 36). Thus, the notebook computer operates stand alone (**not docked to the docking station**) or boots up in a stand-alone mode*".  As discussed at column 6, lines 52-57. "*If, however, the docking station and the notebook computer are compatible, the notebook software next determines whether the ROM date is sufficiently new to*

*enable **at least minimum functionality** between the notebook 200 and the docking station 300 (block 26)".*

Accordingly, applicants respectfully submit that <u>Krancher</u> pertains to **compatibility not security**, as discussed in <u>Seeker</u>. The quick switches are closed or not closed based on **compatibility** and ensuring that "*at least minimum functionality*" is achieved, **not based on security**, as discussed in <u>Seeker.</u> Furthermore, if there is incompatibility, the buses of the notebook and the docking station are **not coupled**, which is different than filtering trusted cycles when the docking station and external device **are coupled**.

The Examiner does not even appear to have sufficiently addressed such differences between security and compatibility.

Accordingly, Applicants respectfully submit that <u>Seeker</u> and <u>Krancher</u> should not be combined in the manner proposed, and that a *prima facie* case of obviousness has not been established.

For at least one or more of these reasons, claim 10 and its dependent claims are believed to be allowable over <u>Seeker</u> and <u>Krancher</u>.

Independent claims 1 and 7, and their respective dependent claims, are believed to be allowable for one or more similar reasons.

### 35 U.S.C. §103(a) Rejection – Seeker, Krancher, Strongin

Claims 3-6, 12-19, 29-32 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over <u>Seeker</u> in view of <u>Krancher</u> and in view of U.S. Patent No. 6,832,317 issued to Strongin et al. (hereinafter "<u>Strongin</u>"). Without admitting that these references could or should be combined, the Applicants respectfully submit that the present claims are allowable over <u>Seeker</u>, <u>Krancher</u>, and <u>Strongin</u>.

Claim 29 recites:

"*A system comprising:*

*a chipset;*

*a first internal component to provide at least one hardware cryptographic functionality selected from hardware protected storage, platform binding, and platform authentication;*

*a second internal component to provide a trusted input capability from a keyboard;*

*a bus coupled to the chipset, coupled to the first internal component, and coupled to the second internal component, the bus to communicate a trusted data cycle from the chipset to the first internal component, **the trusted data cycle having a predefined trusted data cycle indicator;***

*a docking connector; and*

*secured docking logic coupled between the bus and the docking connector, the secured docking logic to block the trusted data cycle **having the predefined trusted data cycle indicator** from an external device coupled with the docking connector*".

As understood by Applicants, Seeker, Krancher, and Strongin do not disclose these limitations or render them obvious. In particular, as understood by Applicants, Seeker and Krancher and Strongin do not disclose or render obvious a "*trusted data cycle having **a predefined trusted data cycle indicator***" and "*secured docking logic coupled between the bus and the docking connector, the secured docking logic to block the trusted data cycle **having the predefined trusted data cycle indicator** from an external device coupled with the docking connector*".

Seeker and Krancher do not disclose these limitations or render them obvious. The discussion above is pertinent to this point.

As understood by Applicants, Strongin does not remedy all of what is missing from Seeker and Krancher and/or the Examiner has not articulated where all of these missing limitations could be found in Strongin.

For at least one or more of these reasons, claim 29 and its dependent claims are believed to be allowable over Seeker, Krancher and Strongin.

## 35 U.S.C. §103(a) Rejection – Seeker, Krancher, Strongin, Probst

Claims 20-22 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Seeker in view of Krancher and in view of Strongin and in view of U.S. Patent No. 5,982,899 issued to Probst (hereinafter "Probst").

Claims 20-22 depend from, and include all of the limitations of, independent claim 10. As discussed above, Seeker and Krancher do not disclose or render obvious the limitations of claim 10. As understood by Applicants, Strongin and Probst do not remedy all of what is missing from these references. Moreover, the Examiner does not appear to have relied upon Strongin and Probst as disclosing all of these limitations, or articulated where all of these missing limitations are found in Strongin and Probst. Accordingly, without admitting that these references could or should be combined, Applicants respectfully submit that independent claim 10 is believed to be allowable over Seeker, Krancher, Strongin, and Probst. Dependent claims 20-22 are believed to be allowable for at least this reason, as well as for the recitations set forth in each of these dependent claims.

## 35 U.S.C. §103(a) Rejection – Seeker, Krancher, Yanagisawa

Claims 25 has been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Seeker in view of Krancher and in view of U.S. Patent No. 6,519,669 issued to Yanagisawa (hereinafter "Yanagisawa").

Claim 25 depends from, and includes all of the limitations of, independent claim 1. As discussed above, Seeker and Krancher do not disclose or render obvious the limitations of claim 1. As understood by Applicants, Yanagisawa does not remedy all of what is missing from these references. Moreover, the Examiner does not appear to have relied upon Yanagisawa as disclosing all of these limitations and/or articulated where all of these missing limitations are found in Yanagisawa. Accordingly, without admitting that these references could or should be combined, Applicants respectfully submit that independent claim 1 is believed to be allowable over Seeker,

Krancher, and Yanagisawa.  Dependent claim 25 is believed to be allowable for at least this reason, as well as for the recitations set forth in this dependent claim.

## Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

## Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

## Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

## Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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